

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

LOUISIANA MUNICIPAL RISK
MANAGEMENT AGENCY,

Plaintiff,

v.

TEAM HEALTH HOLDINGS, INC.,
AMERITEAM SERVICES, LLC, HCFS
HEALTH CARE FINANCIAL SERVICES,
LLC, and ACS PRIMARY CARE
PHYSICIANS LOUISIANA PC,

Defendants.

Case No. 3:22-cv-00104

JOINT MOTION FOR ENTRY OF PROTECTIVE AND CONFIDENTIALITY ORDER

Plaintiff and Defendants, through respective undersigned counsel, hereby move jointly under Federal Rule of Civil Procedure 26 and ECF Rules 4.8 and 6 for entry of the attached Protective and Confidentiality Order. As required, the attached Protective and Confidentiality Order bears the signatures of all counsel of record in the case (all have consented to e-signature execution by the designated undersigned).

In support of this motion, the parties would show that the terms of the attached protective order are reasonably required to protect trade secrets and confidential commercial, financial, medical or other private and proprietary information, the disclosure of which would risk substantial harm to the producing party. The proposed order is similar to others routinely entered by the courts. *See, e.g., Image Point, Inc. v. Keyser Industries, Inc.*, No. 3:04-CV-119, 2005 U.S. Dist. LEXIS 44727, 2005 WL 12442067 (E.D. Tenn. Feb. 10, 2005) (entering protective

and confidentiality order); *Perry v. Allstate Prop. & Cas. Ins. Co.*, No. 2:18-cv-02417-cgc, 2018 U.S. Dist. LEXIS 244266 (W.D. Tenn. Dec. 31, 2018) (same).

Wherefore, the parties respectfully request that their joint motion be granted and that the proposed Protective and Confidentiality Order be entered.

Dated: October 13, 2022.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

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CERTIFICATE OF SERVICE

I hereby certify under Rule 5 of the Federal Rules of Civil Procedure that a true and exact copy of the foregoing Joint Motion for Entry of Protective and Confidentiality Order was served on the following counsel of record via operation of the Court's electronic filing system:

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Dated October 13, 2022.

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